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16 UNITED STATES BANKRUPTCY COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 (SAN FRANCISCO DIVISION)

19 In Re

20 PG&E CORPORATION,

21 and

22 PACIFIC GAS AND ELECTRIC COMPANY,

23 Debtors.

Case No. 19-30088 DM

CHAPTER 11

**JOINDER BY ESC LOCAL 20 IN
MOTION OF THE AD HOC
COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS TO
TERMINATE THE DEBTORS'
EXCLUSIVE PERIODS PUSUANT TO
SECTION 1121(D)(1) OF THE
BANKRUPTCY CODE
(DOC. 2741)**

- 24 ☐ Affects PG&E Corporation
25 ☐ Affects Pacific Gas and Electric Company
26 ☒ Affects both Debtors

Date: July 24, 2019
Time: 9:30 a.m.
Location: U.S. Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

27 *All papers shall be filed in the Lead Case,*
28 *No. 19-30088 (DM)*

Engineers and Scientists of California Local 20, IFPTE ("ESC Local 20"), the exclusive collective bargaining representative of over 3,700 of the Debtors' professional and technical employees pursuant to a collective bargaining agreement, hereby joins the Motion of the Ad Hoc Committee of Senior Unsecured Noteholders to Terminate the Debtors' Exclusive Periods

1 Pursuant to Section 1121(d)(1) of the Bankruptcy Code (Doc. 2741), and asks that the Court
2 immediately terminate the Debtors' exclusive right to file and seek acceptances of a plan.

3 ESC Local 20 represents the engineers, estimators, mappers, project managers, and other
4 professional and technical employees that have been doing the important work needed to maintain
5 and modernize the systems and keep the public utility safe. These employees will be critical to
6 any reorganization effort.

7 ESC Local 20 does not endorse the particular plan described by the Senior Unsecured
8 Noteholders at this time, but it does support termination of the Debtors' exclusivity period so that
9 competing plans may be considered and a plan can be confirmed. Confirmation of a plan as soon
10 as possible is in the best interests of all parties.

11 Although the Ad Hoc Committee of Senior Unsecured Noteholders requests termination
12 of the Debtors' exclusivity period only for itself, so that only the Ad Hoc Committee would be
13 permitted to file and solicit a plan of reorganization, ESC Local 20 supports the termination of the
14 Debtors' exclusivity period generally. Creditors should be afforded the opportunity to evaluate
15 any credible plan that would put the Debtors in a position to emerge as a safe, viable, and
16 responsible enterprise.

17 Because ESC Local 20 believes that competing plans will ultimately yield the best
18 possible result for employees and other critical stakeholders, ESC Local 20 supports the Motion
19 and further requests that this Court enter an order terminating the Debtors' exclusivity period in
20 order to permit all parties to file and solicit acceptances of a plan of reorganization.

21 Dated: July 16, 2019

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

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24 By: /s/ Emily P. Rich
EMILY P. RICH

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